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 Attorneys for Defendant United Air Lines, Inc.

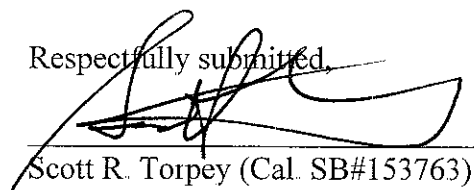
**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ALL NIPPON AIRWAYS COMPANY, LTD.)	Case No. C07-03422 EDL
)	Hon. Elizabeth D. Laporte
Plaintiff,)	
vs.)	
)	
UNITED AIR LINES, INC.,)	
)	
Defendant.)	
)	
UNITED AIR LINES, INC.)	
)	
Counter-Plaintiff,)	
vs.)	
)	
ALL NIPPON AIRWAYS COMPANY, LTD.)	
)	
Counter-Defendant)	

**UNITED AIRLINES, INC.'S OBJECTIONS TO
 PLAINTIFF'S SEPTEMBER 14, 2007 DOCUMENT REQUEST**

NOW COMES Defendant/Counter Plaintiff United Airlines, Inc. ("United"), by and through its attorneys, Jaffe, Raitt, Heuer & Weiss, P.C., and pursuant to F.R.C.P. 30(b)(5) and 34(b) and objects to the Plaintiff's September 14, 2007 Document Request to the extent it seeks information protected by the attorney/client privilege and/or the work product doctrine. United

1 further objects to this request to the extent that it seeks information protected by the "self-
2 critical analysis" privilege. *See, Dowling v. American Hawaii Cruises, Inc* , 971 F 2d 423, 425
3 (9th Cir. 1992); *see, also, Bradley v Melroe Co.* , 141 FRD 1, 3 (d. DC 1992); *Granger v.*
4 *National RR Passenger Corp* , 116 FRD 507, 510(E.D. PA 1987); *Leon v. County of San*
5 *Diego*, 202 FRD 631, 637 (S.D. Cal. 2001) (*dictum*). In addition, United objects to the request
6 as it is overly broad, unduly burdensome and beyond the scope of permissible discovery in this
7 action.
8

9 Respectfully submitted,
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CERTIFICATE OF SERVICE

I am a resident of the State of Michigan, over the age of eighteen years, and not a party to the within action. My business address is 27777 Franklin Road, Suite 2500, Southfield, Michigan 48034. On October 3, 2007 I served the following documents:

**UNITED AIRLINES, INC.'S OBJECTIONS TO
PLAINTIFF'S SEPTEMBER 14, 2007 DOCUMENT REQUEST**

By:



Electronic Service: I hereby certify that on October 3, 2007 I electronically filed the foregoing paper with the Clerk of the Court using the ECF System which will send notification of such filing to the following:

Marshall S. Turner
Condon & Forsyth LLP
7 Times Square
New York, NY 10036

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By Facsimile: I caused the above-referenced document(s) to be transmitted by facsimile machine to the person(s) at the addresses set forth above



By Mail: As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Southfield, Michigan in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.



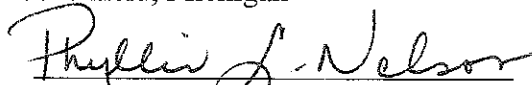
By Personal Service: I caused the above-referenced document(s) to be personally delivered by hand to the person(s) at the address(es) set forth above.



By Overnight Courier: I caused the above-referenced document(s) to be delivered by Federal Express to the person(s) at the address(es) set forth above.

Federal: I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

EXECUTED on October 3, 2007 at Southfield, Michigan


Phyllis L. Nelson